

Lavery & Sirkis

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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

IN RE:

PERKOWSKY, FRANK & REBECCA,
Debtors.

SUBURBAN REALTY, L.P.

Plaintiff,

v.

FRANK PERKOWSKY &
REBECCA PERKOWSKY

Defendants.

Case No. 15-16734(CMG

Hon. Christine M. Gravelle, U.S.B.J.

Chapter 7

Adv. Pro. No. 15-01913

**ANSWER TO DETERMINE DEBTS OF SUBURBAN REALTY, L.P. TO BE NON-
DISCHARGEABLE PURSUANT TO 11 U.S.C. § 523(a)(2) & (a)(4)**

Frank and Rebecca Perkowsky, the debtors in the above Chapter 7 bankruptcy Case, by and through their counsel, Joan Sirkis Lavery, Esquire, by way of response, answer as follows:

PARTIES

1. Admitted.
2. Admitted.
3. Neither admitted nor denied, plaintiff is left to its proofs.

4. Admitted.

JURISDICTION

5. Admitted .

6. Admitted.

7. Admitted.

RELEVANT FACTS

8. Neither Admitted nor denied, plaintiff is left to its proofs.

9. Denied.

10. Neither admitted nor denied, plaintiff is left to its proofs.

11. Neither admitted nor denied, plaintiff is left to its proofs.

- a. Neither admitted nor denied, plaintiff is left to its proofs.
- b. Neither admitted nor denied, plaintiff is left to its proofs.
- c. Neither admitted nor denied, plaintiff is left to its proofs.
- d. Neither admitted nor denied, plaintiff is left to its proofs.
- e. Neither admitted nor denied, plaintiff is left to its proofs.
- f. Neither admitted nor denied, plaintiff is left to its proofs.

12. Admitted.

13. Neither admitted nor denied, plaintiff is left to its proofs.

14. Neither admitted nor denied, plaintiff is left to its proofs.

15. Admitted.

16. Neither admitted nor denied, plaintiff is left to its proofs.

17. Admitted.

COUNT ONE

18. Neither admitted nor denied, plaintiff is left to its proofs.
19. Neither admitted nor denied, plaintiff is left to its proofs.
20. Denied.
21. Neither admitted nor denied, plaintiff is left to its proofs.
22. Denied.
23. Denied.
24. Denied.
25. Neither admitted nor denied, plaintiff is left to its proofs.
26. Denied.
27. Neither admitted nor denied, plaintiff is left to its proofs.
28. Neither admitted nor denied, plaintiff is left to its proofs.
29. Denied.

WHEREFORE, the debtors/defendants demand that Judgment on the Complaint be denied.

COUNT TWO

30. Neither admitted nor denied, plaintiff is left to its proofs.
31. Admitted.
32. Neither admitted nor denied, plaintiff is left to its proofs.
33. Denied.
34. Denied.

35. Denied.

36. Denied.

37. Denied.

38. Neither admitted nor denied, plaintiff is left to its proofs.

39. Denied.

40. Admitted.

41. Neither admitted nor denied, plaintiff is left to its proofs.

42. Denied.

43. Denied.

WHEREFORE, the debtors/defendants demand that the Judgment on the Complaint be Denied.

LAVERY & SIRKIS
Attorney for the Debtors,
Frank & Rebecca Perkowsky

Dated: May 28, 2015

/s/ Joan Sirkis Lavery



JOAN SIRKIS LAVERY